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June 10, 2011

Kathi Moore, Manager
Case Development Cost Recovery Section
Superfund Division
United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

RE: Response to Information Request for the San Fernando Valley/North Hollywood
Superfund Site, North Hollywood, California

Dear Ms. Moore,

This letter responds to the CERCLA §104(e) Information Request dated May 4, 2011, directed to and received by Gary James on May 14, 2011, relating to the above referenced Superfund Site ("Site").

In response to the Information Request, Gary James has undertaken a search of all reasonably available information relating to the former Jamespray, Inc.'s activities at the Site. Please be advised that, although Gary James has conducted a diligent and good faith review of all reasonably available records and information in responding to this Request, its efforts are necessarily constrained by the following facts:

- Jamespray, Inc. dissolved in 1976. In the 35 years since the company dissolved, all records relating to business operations were destroyed or lost several years ago and are no longer within the custody or control of Mr. James.
- The enclosed response is based on Mr. James' good faith recollection of Jamespray's operations.

Notwithstanding the above limitations, Gary James is making a good faith effort to respond to the Request and reserves the right to supplement this response if and when additional relevant and responsive information becomes available. It is also important to note that Mr. James is

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The information contained in the enclosed response is hereby submitted by Gary James without admitting any liability for conditions at the Site and without waiving any defenses it may have for liability or costs incurred at the Site under law.

If you have any further questions, please contact me at (253) 203-6226.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimberly Seely', with a long horizontal flourish extending to the right.

Kimberly Seely
Legal Counsel for Mr. James

Enclosure

ENCLOSURE B: INFORMATION REQUEST

Preliminary Statement

Jamespray, Inc. ("Jamespray") hereby responds to the United States Environment Protection Agency's ("EPA") Request for Information dated May 4, 2011, pursuant to Section 104€ of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. §9604(e) (the "Request"). The Request seeks information about potentially responsible parties who may have information related to activities, which may have resulted in a release or potential release of hazardous substances to the San Fernando Valley/North Hollywood Superfund Site ("Site").

This response is based on inquiries, a reasonable search of available records, and interviews with Jamespray's former president and shareholder, Mr. Gary James. Unless otherwise stated, the below responses represent the best of Jamespray's knowledge at this time. Because of the amount of time that has passed since Jamespray's limited operations at the Site and Jamespray's dissolution, Jamespray was unable to locate records responsive to this request. In order to respond to each question below, Jamespray relied on information provided in an interview with Mr. James.

Nothing herein should be deemed to constitute a waiver of any rights or objections, or an admission that Jamespray or Mr. James is any way liable or responsible for costs incurred or to be incurred by EPA, or any other party, relating to the Site. Jamespray makes this response without admitting that any hazardous substance or material was released or deposited by Jamespray and without prejudice to any position Jamespray may take in connection with the Site, the property, or any action or proceeding related to the Site in the future. Moreover, Jamespray reserves any and all rights and defenses it has, or may have, with regard to any claims brought against it.

General Objections

These general objections apply to each of the information request questions submitted to Jamespray and are incorporated into each of the responses to the questions set forth below. Jamespray is providing the enclosed information to the extent that it is relevant, reasonably obtained, and subject to the following objections (the "General Objections").

1. Jamespray objects to the overbroad and unduly burdensome nature of the questions included in the Request.
2. Jamespray objects to the Request to the extent it seeks information not related to the ability of a person to pay for or perform a cleanup.
3. Jamespray objects to each and every question to the extent it is unreasonably cumulative or duplicative, or is obtainable from some other sources, or are already in the Agency's possession, or more convenient and less burdensome to obtain from other sources.

4. Jamespray objects to each and every question to the extent it calls for information or documents that are protected by the attorney client privilege, the work-product doctrine, the joint defense privilege, or any other applicable privilege. Jamespray asserts all applicable privileges and protections it has with regard to EPA's inquiries including the attorney-client privilege, the attorney work product doctrine, materials generated in anticipation of litigation, privileges for materials which are proprietary, trade secret or other confidential business information. Such privileged information and documents will not be produced. In the event such documents are produced, such production is inadvertent and does not constitute a waiver of objection;
5. Jamespray objects to each and every question to the extent that information and documents sought do not relate and are not reasonably relevant to the site and that the requests are therefore not in accordance with law.
6. Jamespray objects to EPA's definition of "Respondent" and "you" in its information request, as the terms are overbroad and it is not possible for Jamespray to answer questions on behalf of all persons thereby defined.
7. Jamespray objects to providing information which: (1) is not in its possession, custody or control; (2) is in the possession, custody or control of EPA or third parties; or (3) is otherwise beyond the scope of EPA's authority under CERCLA §104.
8. Jamespray objects to the definition of "waste" or "wastes" in Definition No. 3, and to the definition of "materials" in Definition No. 8, as vague, ambiguous, and overly broad.
9. Jamespray objects to the definition of "documents" in Definition No. 9 as overbroad, oppressive, impracticable, unnecessary to carry out the objective of CERCLA, and seeks to impose on Jamespray obligations not authorized by law.
10. Notwithstanding and without waiving these objections, and subject to them, Jamespray has prepared this response based upon information available to it. Where requests are vague, ambiguous, overbroad, unduly burdensome, or beyond the scope of EPA's authority pursuant to Section 104(e) of CERCLA, Jamespray is making appropriate and reasonable efforts to provide responsive information based on Jamespray interpretation of the requests. To the extent that information submitted herein is not required by law or is otherwise outside the scope of EPA's 104(e) authority, that information is voluntarily submitted. Jamespray waives no rights or protection of information it voluntarily submits.

Subject to and without waiving the foregoing, Jamespray hereby responds to EPA's Request as follows:

1. *State the full legal name, address, telephone number, positions(s) held by, and tenure of The individual(s) answering any of the questions below on behalf of Jamespray, Inc. (the "Company").*

Gary Robert James
Former President and Shareholder of Jamespray, Inc.

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2. *Identify the individuals who are or were responsible for environmental matters at the Company's facility located at 12600 Saticoy Street, North Hollywood, California (the "Facility"). Henceforth, the term "Facility" shall be interpreted to include both the real property at 12600 Saticoy Street and any improvement thereto. For each individual responsible for environmental matters, provide his/her full name, current or last known address current or last known telephone number, position titles, and the dates each individual held such position.*

Individuals responsible for environmental matters at Jamespray included Mr. Gary James, the former president of Jamespray, and contractors hired to deliver and recycle drums of material. The names of such contractors cannot be located.

3. *If the Company is or was operating under a fictitious business name at the Facility, identify the fictitious name and the owner(s) of the fictitious name, and provide a copy of the Fictitious Business Name Statement filed with the county in which the company is or was doing business.*

Jamespray did not operate under a fictitious business name.

4. *Identify the dates the Company, under any of its current or former business structures, owned the Facility. Provide a copy of the title documentation evidencing the Company's ownership of the Facility.*

Jamespray did not own the underlying property or the Facility. Jamespray leased the facility from 1971 to late 1975/early 1976. After a reasonable search of available records, the lease contract and the name of the lessor were unable to be located.

5. *For any period of time in which the Company, under any of its current or former business structures, owned the Facility, provide the name, address, and phone number of any tenant or lessee. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to any other operators at the Facility.*

Jamespray did not own the underlying property or the facility. Jamespray leased the property. The lease contract cannot be located.

6. *Provide the dates that the Company, under any of its current or former business structures, operated at the Facility.*

Jamespray leased the facility for approximately four years, from 1971 to later 1975/early 1976. Jamespray voluntarily dissolved in early 1976 and had no further operations at the Site or any other location.

7. *For any period of time in which the Company, under any of its current or former business structures, operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to the real property owner during the Company's occupancy of the Facility.*

Jamespray has been unable to locate the name, address or phone number of the Facility's owner. Jamespray has been unable to locate the lease contract between Jamespray and the Facility owner. The Facility was newly constructed when Jamespray began its lease in 1971. To the best of Jamespray's knowledge there were no former operations at the Facility.

8. *Identify any individual or entity that owned or operated the Facility prior or subsequent to the Company. For each prior or subsequent owner or operator, further identify:*

- a. The dates of ownership/operation;*
- b. The nature of prior or subsequent operations at the Facility;*
- c. All evidence showing that the prior or subsequent owner or operator controlled access to the property; and*
- d. All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the Facility during the period of prior or subsequent ownership or operation.*

- a. To the best of Jamespray's knowledge, there were no individuals or entities that owned or operated the Facility prior to Jamespray. After Jamespray's voluntary dissolution in 1976, SprayCo, Inc. ("SprayCo") began operations at the Facility. Jamespray was unable to locate any further information relating to SprayCo's term of operations.
- b. To the best of Jamespray's knowledge, there were no prior operations at the Facility. To the best of Jamespray's knowledge, SprayCo conducted spray painting operations. Jamespray was unable to locate further information relating to SprayCo's operations.
- c. To the best of Jamespray's knowledge, there were no prior operations at the Facility. Jamespray has been unable to locate evidence showing SprayCo controlled access to the property.
- d. To the best of Jamespray's knowledge, there were no prior operations at the Facility. Jamespray has been unable to locate evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the Facility during the SprayCo's period of subsequent operation.

9. *Provide a complete list of employees who had knowledge of the use of hazardous substances and disposal of wastes at the Facility during any or all of the period of time that the Company operated at or was otherwise associated with the Facility. For each employee listed, provide the following information:*

- a. The employee's full name;*

- b. *The employee's current or last known address and telephone number, including the last known date on which you believe each address and telephone number was current;*
- c. *The dates that the employee worked at the Facility;*
- d. *The position(s) the employee held under any of the Company's business structures; and*
- e. *The employee's job title(s) and the corresponding dates during which the Company believes that the employee would have had knowledge of the use and disposal of wastes.*

Jamespray is unable to locate a complete list of employees. Documents relating to employees' names, addresses, phone numbers, dates employed, and positions held at Jamespray have been either lost or destroyed since Jamespray's voluntary dissolution in 1976.

10. *Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and the product(s) manufactured or services performed by the Company at the Facility. Describe any significant change in Facility size, the number of employees, or the products manufactured over time.*

For the four years Jamespray leased the Facility, the company had 15-20 part-time and full-time employees. The Facility was small, totaling approximately 12,000 square feet. There were no products manufactured at the Facility. Jamespray performed silk screening and painting services. Silk screening made up only about 10% of the overall operation at the Facility and consisted of using small amounts of ink pressed through a silk screen onto aircraft parts to create identification marks. The silk screening procedures were always specified in the blueprint or purchase order according to government or private firm specifications. Jamespray had no discretion regarding silk screening procedures.

The majority of Jamespray's painting operations consisted of spray painting metal military aircraft parts or electronic devices for the federal government or its contractors. Paint was always applied to the part in a SCAQMD approved and permitted paint booth, with approved and permitted arrestor pads. Arrestor pads collected spray from the air within the paint booth and were dried and properly disposed.

There were no significant changes in the Facility size or number of employees during Jamespray's lease of the Facility.

11. *If any substance containing chromium as a component ("chromium-related substances") was utilized in any of the Company's operations at the Facility, provide a complete description of those operations. Indicate the approximate volume of Chromium or chromium-related substances used per month at the Facility, the dates chromium or chromium-related substances were used, and the storage and disposal practices in effect during the Company's operations at the Facility for materials containing chromium. Include documentation evidencing the Company's use of chromium or chromium-related substances.*

The federal government required Jamespray to use a zinc chromate primer pursuant to MIL-P 8585A (military specification). Jamespray bought the primer in 1 or 5 gallon cans, and only used 1-5 gallons per month. None of the zinc chromate paint was thrown away, all paint was used on the aircraft parts and any overspray went into the arrestor pads within the permitted paint booth. Arrestor pads were replaced and floors were cleaned daily. Very little, if any, paint was deposited on the floor in the spray booths and there were no floor drains in the Facility. The zinc chromate primer was not stored at the Facility; Jamespray only purchased enough for each individual job. Short term storage of paint at the Facility was within the AQMD and fire department approved storage area.

12. *Provide a scaled map of the Facility which includes the locations of significant buildings and features. Indicate the locations of any maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:*

- a. *Surface structures (e.g., buildings, tanks, containment and/or storage areas, etc.);*
- b. *Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);*
- c. *Groundwater and dry wells, including drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);*
- d. *Past and present stormwater drainage system and sanitary sewer system, including septic tank(s) and subsurface disposal field(s);*
- e. *Any and all additions, demolitions or changes of any kind to physical structures on, under or about the Facility or to the property itself (e.g., excavation work), and state the date(s) on which such changes occurred; and*
- f. *The location of all waste storage or waste accumulation areas as well as waste disposal areas, including but not limited to dumps, leach fields, and burn pits.*

Jamespray was unable to locate a map of the Facility.

- a. One 12,000 square foot building which housed the spray booths, paint equipment, and silk screening equipment. There were no on-site tanks, sumps, or clarifiers.
- b. To the best of Jamespray's knowledge, there were no subsurface structures.
- c. To the best of Jamespray's knowledge, there were no groundwater or dry wells.
- d. There was a stormwater system at the Facility, but Jamespray has been unable to locate any drawings or specifications of such system.
- e. There were no demolitions or changes of any kind to the physical structures at the Facility during Jamespray's lease term. The Facility was newly constructed when Jamespray began its four-year lease in 1971.
- f. Jamespray had a commercial trash bin which was hauled away twice a week to a landfill. To the best of Jamespray's knowledge, there were no other waste disposal areas, dumps, leach fields, or burn pits at the Facility during Jamespray's lease term.

13. *Provide copies of hazardous material business plans and chemical inventory forms (originals and updates) submitted to city, county, and state agencies for the Facility.*

Jamespray has conducted a reasonable search and has been unable to locate documents responsive to Question 13.

14. *Provide a list of all chemicals and hazardous substances used at the Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets for all hazardous substances used.*

There are no MSDS available. To the best of Jamespray's knowledge, chemicals and hazardous substances used at the Facility were limited to paints, small amounts of ink (chemical compound unknown), TCE, zinc chromate paint, styrenated alkyd paints, polyurethane paints, paint thinner with xylene and toluene.

15. *Identify and provide the information below for all volatile organic compounds (most notably PCE; TCE; 1,1-DCE; MTBE; 1,4-DCA, cis-1,2-DCE; and carbon tetrachloride); Title 22 metals including total and hexavalent chromium; 1,4-dioxane; N-nitrosodimethylamine (NDMA); perchlorate; dioxins and furans, which are or were used at, or transported to, the Facility:*

- a. *The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Data Sheet for each product;*
 - b. *The location(s) where each chemical or hazardous substance is or was used, stored, and disposed of;*
 - c. *The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;*
 - d. *The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and*
 - e. *The supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemicals or hazardous substances.*
- a. Jamespray has been unable to locate documentation indicating the trade or brand name or other information for the chemical or hazardous substances for each product.
 - b. Jamespray has been unable to locate a map of the Facility.
 - i. TCE was used for degreasing in the vapor degreaser.
 - ii. Paints were used in the permitted and approved spray booths.
 - iii. Ink was used in small amounts with silk screening equipment only.
 - c. To the best of Jamespray's knowledge, the only wastes at the Facility were spent TCE, spent thinner and arrestor pads from spray painting within the paint booths. The spent TCE and spent thinner were recycled and the arrestor pads were properly disposed.
 - d. TCE was purchased in 55-gallon drums, one 55-gallon drum at a time. The TCE was used in the vapor degreaser until it was dirty. The spent TCE was placed back into a drum and picked up by the recycling contractor for a new drum. The contents of the

new drum would be placed in the vapor degreaser. This occurred two to three times per year. Jamespray has been unable to locate information regarding the name and contact information of the supplier or recycler of the TCE. Paint thinner was used to thin paint for spray and to clean parts. There were two types of paint thinner, one for summer and one for winter. To the best of Jamespray's knowledge, Cardinal Industrial Finishes supplied the paints and thinners. Thinners were bought in 55-gallon drums. Thinner was purchased once every 2-3 months. Spent thinner from parts cleaning was recycled and stored in a drum. All drums were stored in fire department approved areas on wooden pallets.

16. *Provide copies of all investigation and sampling reports containing environmental data or technical or analytical information regarding soil, water, and air conditions at the Facility, including, but not limited to, data or information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology, and groundwater sampling.*
- a. *State to the best of the Company's knowledge whether the documents provided represent a complete listing of all soil, soil gas and groundwater sampling conducted at the Facility. If they do not, and the Company does not have a copy of the additional investigation or sampling report(s), please describe the date and type of sampling conducted, and provide information on where EPA might obtain a copy of the report and related documents.*
 - b. *State whether the Company is aware of any future soil, soil gas or groundwater sampling which is planned at the Facility, and if so, please explain.*

To the best of Jamespray's knowledge, there are no investigations or sampling reports available for the Facility.

17. *Identify, and provide copies of, all agency orders, correspondence and/or workplans that discuss proposed soil or groundwater sampling at the Facility but for which the sampling was never conducted. Explain why the proposed sampling was not conducted.*

To the best of Jamespray's knowledge, there are no agency orders, correspondence or workplans available for the Facility.

18. *Provide copies of any due diligence reports or property transfer assessments which relate to the Facility.*

To the best of Jamespray's knowledge, there are no due diligence reports or property transfer assessments available which relate to the Facility.

19. *Identify, and provide the following information for, all groundwater wells that are located at the Facility:*
- a. *A map with the specific locations of the Facility groundwater wells;*
 - b. *Date the Facility groundwater wells were last sampled;*

- c. *List of all constituents which were analyzed during groundwater sampling events; and*
- d. *All groundwater sampling results, reports of findings, and analytical data.*

To the best of Jamespray's knowledge, there are no groundwater wells located at the Facility.

20. *Provide copies of any applications for permits or permits received under any local, state, or federal environmental laws and regulations for the Facility, including any waste discharge permits, such as national pollutant discharge elimination system permits.*

Jamespray has been unable to locate applications for permits or permits received for the Facility. However, Jamespray's spray painting operations were permitted and approved by AQMD.

21. *If the Company discharged any of its waste stream to the sewer at the Facility, provide copies of all permits and all analyses performed on discharged water, and identify all locations where waste streams were discharged.*

There was no waste stream discharged from the Facility during Jamespray's lease term.

22. *For each waste stream generated at the Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.*

There was no waste stream discharged from the Facility during Jamespray's lease term. The only disposal to the sewer was from toilets and hand-washing sinks, which used only hand soap for washing.

23. *Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Facility prior to transport to a disposal site.*

There was no waste stream discharged from the Facility during Jamespray's lease term.

24. *Please describe the method used by the Company to remove waste streams from sumps at the Facility.*

There was no waste stream or sumps at the Facility during Jamespray's lease term.

25. *Please identify all wastes that were stored at the Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.*

All paints and thinners were stored on wooden pallets in a storage area permitted and approved by the local fire department. Barrels of TCE were stored and used in the degreaser and spent TCE was not stored at the Facility for more than 1-2 days before pickup by the recycling company.

26. *Please identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. In addition, identify and provide supporting documentation of:*
- a. *The date each release occurred;*
 - b. *The cause of each release;*
 - c. *The amount of each hazardous substance, waste, or pollutant or contaminate released during each release;*
 - d. *Where each release occurred and what areas were impacted by the release; and*
 - e. *Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.*

There were no leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants during Jamespray's lease term at the Facility.

27. *Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.*

Jamespray has been unable to locate any correspondence between Jamespray and local, state or federal authorities concerning the use, handling, or disposal of hazardous substances at the Facility.

* Please note that the source of all answers above was interviews with Mr. Gary James, former president of Jamespray.